

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: _____

: VIOLATIONS:

: 21 U.S.C. §§ 846, 841(b)(1)(A)

(conspiracy to distribute 5 kilograms or

: more of cocaine - 1 count)

21 U.S.C. §§ 846, 841(b)(1)(A)

: (attempted possession with intent to

distribute 5 kilograms or more of cocaine

: - 1 count)

18 U.S.C. § 924(c)

: (possession of firearm in furtherance of drug trafficking crime - 1 count)

: 18 U.S.C. § 2

(aiding and abetting)

: Notice of forfeiture

COUNT ONE

1. On or about February 7, 2007, in Philadelphia, in the Eastern District of

Pennsylvania, defendants

a/k/a “Bub,”

a/k/a “Coat,”

a/k/a “Coulter,”

a/k/a “C,”

a/k/a “Nah,” and

MARK RIMES

conspired and agreed, together and with persons known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute 5 kilograms or more, that is approximately 29.5 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants LLOYD WASHINGTON, JR., MARK RIMES, RONALD CRAWFORD, and NIEMA SIMPSON agreed to pick up and transport kilograms of cocaine, which had been sent from a location in California to Philadelphia, Pennsylvania.

3. At the direction of defendant LLOYD WASHINGTON, JR., defendants NIEMA SIMPSON and RONALD CRAWFORD retrieved and transported parcels containing kilograms of cocaine that were delivered to a United Parcel Service (“UPS”) store in Philadelphia, Pennsylvania.

4. Defendants LLOYD WASHINGTON, JR., RONALD CRAWFORD, and NIEMA SIMPSON communicated with each other using cellular telephones concerning the retrieval of the UPS parcels containing kilograms of cocaine.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the defendants, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere, on or about February 7, 2007:

1. At approximately 9:30 a.m., defendants LLOYD WASHINGTON, JR. and MARK RIMES drove in a silver Buick Rendezvous to the vicinity of the UPS store, located at 211 South Street in Philadelphia.

2. At approximately 9:50 a.m., defendant LLOYD WASHINGTON, JR. got out of the Buick Rendezvous, observed an UPS truck driver make deliveries to the UPS store at 211 South Street, walked to the rear of the UPS truck, and observed parcels remaining in the rear of the truck.

3. At approximately 11:45 a.m., defendants LLOYD WASHINGTON, JR. and MARK RIMES observed another UPS truck driver deliver two (2) parcels that originally contained 29.5 kilograms of cocaine to the UPS store at 211 South Street.

Counter-Surveillance

4. At approximately 11:50 a.m., after defendants LLOYD WASHINGTON, JR. and MARK RIMES circled the block of 211 South Street in the Buick Rendezvous, defendant WASHINGTON got out of the car, walked the 200 block of South Street, and looked into each parked vehicle on the block.

5. At approximately 12:10 p.m., defendants LLOYD WASHINGTON, JR. and MARK RIMES circled the block of 211 South Street in the silver Buick Rendezvous.

6. At approximately 12:40 p.m., defendant MARK RIMES got out of the Buick Rendezvous, walked the 200 block of South Street, looked into parked vehicles on the block, entered the UPS store at 211 South Street, and then returned to the Buick Rendezvous.

7. At approximately 12:50 p.m., defendant LLOYD WASHINGTON, JR. got out of the Buick Rendezvous, entered the UPS store at 211 South Street, and then returned to the Buick Rendezvous

8. At approximately 1:20 p.m., defendant MARK RIMES got out of the Buick Rendezvous, walked the 200 block of South Street, and looked into each parked vehicle on the block.

9. At approximately 1:30 p.m., defendant MARK RIMES got out of the Buick Rendezvous, walked the 200 block of South Street and the 600 block of American Street, and looked into parked vehicles on the blocks.

10. At approximately 2:03 p.m., defendants LLOYD WASHINGTON, JR. and MARK RIMES parked the silver Buick Rendezvous at the intersection of 2nd Street and South Street.

The Cocaine Pickup

11. At approximately 2:07 p.m., defendant RONALD CRAWFORD drove a Victory taxicab, in which defendant NIEMA SIMPSON was a passenger, to 211 South Street and parked in front of the UPS store.

12. At approximately 2:07 p.m., defendant NIEMA SIMPSON got out of the taxicab, entered the UPS store, and picked up two (2) parcels that originally contained 29.5 kilograms of cocaine and put them in the trunk of the Victory taxicab being driven by defendant

RONALD CRAWFORD.

13. Defendant RONALD CRAWFORD then drove the Victory taxicab carrying defendant NIEMA SIMPSON and the two (2) UPS parcels to the intersection of 2nd Street and South Street, where he followed the Buick Rendezvous driven by defendants LLOYD WASHINGTON, JR. and MARK RIMES onto northbound I-95 and exited at Girard Avenue, where they were all arrested by Philadelphia Police officers.

All in violation of Title 21, United States Code, Section 846 and 841(b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 7, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LLOYD WASHINGTON, JR.,
a/k/a "Bub,"
RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C,"
NIEMA SIMPSON,
a/k/a "Nah," and
MARK RIMES**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, 5 kilograms or more, that is, approximately 29.5 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

All in violation of Title 21, United States Code, Section 846 and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 7, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C,"**

knowingly possessed a firearm, that is, a loaded Glock 9mm firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess cocaine with the intent to distribute cocaine, and attempted possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

Forfeiture - 21 U.S.C. 853

1. As a result of the violations of Title 21, United States Code, Section 846, set forth in Counts One and Two of this indictment, defendants

**LLOYD WASHINGTON, JR.,
a/k/a "Bub,"
RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C,"
NIEMA SIMPSON,
a/k/a "Nah," and
MARK RIMES**

shall forfeit to the United States under Title 21, United States Code, Section 853:

a. any and all real or personal property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violations of Title 21, United States Code as charged in this indictment; and

b. any and all real or personal property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations of Title 21, United States Code as charged in this indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

Forfeiture - 18 U.S.C. 924(d)

3. As a result of the violations of Title 18, United States Code, Section 924(c), set forth in this indictment, defendant

**RONALD CRAWFORD,
a/k/a "Coat,"
a/k/a "Coulter,"
a/k/a "C,"**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of this offense, including, but not limited to:

- (a) a loaded Glock 9mm firearm.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney